

## Appendix E. Distribution List

JEROME GRANDI  
2294 WEISER RIVER ROAD  
WEISER ID 83672

JOE QUALLS  
55 W IDAHO STREET  
WEISER ID 83672

JOHN FIELD  
1025 LOWER CRANE CREEK  
WEISER ID 83672

KIRK CAMPBELL  
DEPT OF AGRICULTURE  
2270 PENITENTIARY ROAD  
BOISE ID 83701

VERN LOLLEY  
732 HALE ROAD  
WEISER ID 83672

BILL GAMBLE  
COUNCIL RANGER DISTRICT  
PO BOX 567  
500 EAST WHITLEY  
COUNCIL IDAHO 83612

RONALD POUND  
889 MANN CREEK ROAD  
WEISER ID 83672

VICKI LUKEHART  
WEISER RIVER SCD  
847 EAST 9<sup>TH</sup> STREET  
WEISER ID 83672

ART CORREIA  
1826 COVE ROAD  
WEISER ID 83672

LAVELLE BRAUN  
1129 OLDS FERRY ROAD  
WEISER ID83672

SCOTT KOBERG  
IASCD  
6003 OVERLAND ROAD  
SUITE 204  
BOISE ID 83709

LEIGH WOODRUFF  
EPA-IOO  
1435 NORTH ORCHARD  
BOISE IDAHO 83706



## Notice of Request for Public Comment and Public Meeting on Weiser River Watershed Assessment

The Idaho Department of Environmental Quality (DEQ) is seeking public comment on a draft assessment of water quality in the Weiser River Watershed.

Based on a recent study of the physical, chemical and biological conditions in the Weiser River Watershed, DEQ is proposing to develop the following water quality management plans:

- Weiser River from Galloway Dam to the Snake River to control sediment, bacteria and temperature
- Weiser River from the Little Weiser River to the Galloway Dam to control sediment
- Crane Creek from the reservoir dam to the Weiser River to control sediment and bacteria
- Little Weiser River from Indian Valley to the Weiser River to control bacteria and sediment.

DEQ has also determined that certain waterbodies in the Weiser River Watershed meet water quality standards and is proposing to remove the following from the 2002 Idaho §303(d) list of impaired waterbodies:

- Weiser River from West Fork Weiser River to Little Weiser River for nutrients and sediment
- Mann Creek from the reservoir to the Weiser River for sediment
- Cove Creek for nutrients and sediment
- Johnson Creek for unknown pollutants
- West Fork Weiser River for unknown pollutants
- North Crane Creek for bacteria, flow alteration, nutrients, sediment and temperature
- South Crane Creek for unknown pollutants

Assessment of Crane Creek Reservoir will be delayed until 2006, so that additional data can be collected. The Weiser River watershed will be required to meet a phosphorus allocation set forth in the Snake River – Hells Canyon TMDL.

### **Two public meetings on the draft assessment will be held on:**

- 1) **Monday, August 23<sup>rd</sup> from 7:00 p.m. to 9:00 p.m. at the Vendome Event Center, 309 State Street, Weiser, Idaho.**
- 2) **Tuesday, August 24<sup>th</sup> from 7:00 p.m. to 9:00 p.m. at the DEQ conference center, conference room B. The address is 1410 N. Hilton, Boise, Idaho.**

Copies of the draft assessment are available for review at DEQ's Boise Regional Office; the public libraries in Weiser and Boise, Idaho; Washington County Courthouse in Weiser and the Adams County Courthouse in Council; and in PDF format on DEQ's Web site at [www.deq.state.id.us](http://www.deq.state.id.us) starting Monday, August 9<sup>th</sup> 2004. Public comment on the proposed actions will be accepted through 5 p.m., Friday, September, 24, 2004. Questions, comments and requests may be addressed to:

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## Appendix F. Public Comments

Comments From: Weiser River Watershed Advisory Group Received via email: September 24, 2004	Response:
<p>1) Page XXIV – Key findings – include discussion of temperature as potential limiting factor in number of sediment intolerant species.</p> <p>2) Page XXXV – 2<sup>nd</sup> paragraph – Why is statement about warm water intolerant species in here?</p> <p>3) Page XXXVII – WAG reponse –</p> <p>4) Page 10 – “banks will more stable as vegetation is established.” Only small vegetation is allowed on Corp of Engineers Dikes. Should this statement be eliminated?</p> <p>5) Page 19 – 5<sup>h</sup> paragraph sites existence of volcanic tuff. Discussion somewhere in this document of volcanic tuff as potential source of natural phosphorous should be included.</p> <p>6) Page 32 &amp; 33 – Maps show entire Lower River as bull trout water. THIS NEEDS TO BE FIXED.</p> <p>7) Page 36 and 37 – This time frame is false and needs addressing. As Craig Shepherd explained during our November 18, 2003 meeting, due to work on another TMDL, the DEQ staff assigned to the Weiser River Watershed TMDL was unable to focus on the SBA until March of 2003. During the June WAG meeting, DEQ staff discussed DEQ’s work to date on the SBA, and advised the WAG that DEQ would not make a draft available for WAG review. In response to the WAG’s written request, DEQ distributed a “very rough”, incomplete draft of the SBA to the WAG. No additional information was distributed until DEQ provided the draft SBA and TMDL to the WAG on October 16, and gave the WAG until November 14, 2004 to provide comments to be included in the Executive Summary, presumably in a paragraph or two. DEQ</p>	<p>There is a discussion of the possible effects of temperature on periphyton on page 104. Periphyton communities do not seem to be adversely affected by temperatures between 15 and 30°C. Temperatures in the lower Weiser River have not been shown to go above the threshold of 30°C. For assessment purposes, macroinvertebrate communities seem to be more dependent on substrate and habitat. That is, acceptable communities tolerate higher temperatures, but usually are not found in poor substrate conditions.</p> <p>This paragraph will be removed from the document.</p> <p>This space is reserved for comments from the WAG.</p> <p>The word “historic” has been added to the sentence. The statement is an attempt to show that were the lower Weiser River allowed to establish a floodplain, temperature conditions would in all likelihood improve. However, since the river has been channelized and is no longer allowed to create a floodplain, achieving the temperature standard will be more difficult.</p> <p>A statement concerning this potential will be added.</p> <p>The figures will be adjusted accordingly.</p> <p>The public outreach section of the Executive Summary has been revised to more accurately reflect the process that has occurred since 2004.</p>

intended to issue the draft SBA and TMDL for a 30-day public comment period on December 1, and submit the SBA and TMDL to EPA for approval in February. This is noted in a letter from WAG Chairman Art Correia dated December 5, 2003.	
8) Page 52 – Table 14 – This table is very confusing.	We have changed “IDAPA” to “Water Quality Standards” and hope this clarifies Table 14.
9) Page 75 – Allocations – Nutrient allocations and in-stream targets are not applicable. Should be developed in the implementation plan. There is no impairment by nutrients. The only allocation that applies is the one from SR-HC at the mouth of the Weiser River.	We anticipate nutrient allocations will occur in the implementation plan.
10) Page 86 – 1 <sup>st</sup> paragraph – the discussion of shade shows up again. Needs to be removed!	We could not find the word “shade” on page 86. However, on page 223, the reference to shade will be removed. The completion of the Potential Natural Vegetation TMDL and its acceptance by the WAG has made this comment moot.
11) Page 117 – Table 39, 2 <sup>nd</sup> paragraph shows 3 testing sites, which are not in table 39.	We have corrected this in the document.
12) Page 117 – 1 <sup>st</sup> paragraph USGS guage site is above Crane inflow, sentence should be deleted.	The gauge you refer to (USGS 13265300) has been inactive since 1952. The gage we refer to (USGS 13266000) is located below Crane Creek and has been active since 1952.
13) Page 223 – 4 <sup>th</sup> paragraph – the discussion of shade shows up again???	The reference to shade will be removed. The completion of the Potential Natural Vegetation TMDL and its acceptance by the WAG has made this comment moot.
14) Page 244 – Table 120 – Clarification of table 120. The source of pollution needs to be proven, such as DNA testing	See pages 60 and 61 “Sources of Bacteria”. These paragraphs specify that only controllable sources of bacteria will be addressed in implementation.
15) The testing should be done first to alleviate the confusion in solving the problem.	Additional monitoring will be performed in the future to refine the needs of implementation.
16) Page 259 – Glossary – recommend moving this to the front of the document.	The location of the Glossary is standard in all TMDLs.
17) In summary the WAG would like to see the basis and how data was computed. The tables and charts should be marked as average and not estimates. Some of the tables are not dated. Not all sources of data are identified. The glossary is lacking some definitions.	All data used to compile averages is available in our office. If the WAG desires to see this information, we can make it available. Be advised that the information sought would be many times larger than the document itself. We have also added dates to all tables for clarification.
18) Crane Creek data has not factored in the effects of the hot springs, it has not been documented.	See the Potential Natural Vegetation TMDL for more information.

<p>19) The whole TMDL process is unorganized. A starting point and an ending point should be established. The WAG is not asking for anything other than proof of a problem. The process would like to set targets before identifying what or who the problem is. Identify the source of the problem, and then ask the landowners to do their part.</p>	<p>Comment noted.</p>
<p><b>Comments from:</b> U.S. Environmental Protection Agency Received via email: September 24, 2004</p> <p>We found the Executive Summary especially helpful in presenting a summary of each of the segments, their listings, and conditions. The information in the tables in particular is very well presented.</p> <p>Use of the appendices for presentation of the raw data and data analysis is also very helpful.</p> <p>We are concerned that the temperature TMDLs presented in the document are missing important required information and elements. No quantifiable analyses have been presented in the document to support the proposed loadings, capacities, or allocations. If the data are not available or the proper analysis and modeling have not been completed, perhaps the temperature TMDLs should be rescheduled for a time when such data and analyses are available.</p> <p>Several of the waterbodies are proposed for delisting due to their intermittent flow. These proposed delistings will be evaluated by EPA under a separate review process and EPA will provide comments under separate correspondence. However, we are concerned with the conclusion that no TMDLs are required for these waterbodies due to their intermittence. Idaho water quality standards require that the use be protected in intermittent waterbodies when water is present in the streams. The water quality standards and criteria apply during those times. Perhaps a more detailed analysis of the seasonal variations and conditions of the streams are needed to demonstrate that the designated uses are being protected during the time of year when water is present.</p> <p><b>Specific Comment</b></p>	<p>Response:</p> <p>Thank you.</p> <p>Thank you.</p> <p>A Potential Natural Vegetation TMDL has been developed to address temperature in the Weiser River watershed.</p> <p>DEQ is currently awaiting guidance from the EPA on protocols for monitoring streams that are likely to be dry during base flow periods (July 1 through October 1). If the decision is made to monitor macroinvertebrates, habitat and fish during late winter and early spring runoff periods, then we will pursue monitoring at that time.</p>



<p><b>Executive Summary</b></p> <p>As mentioned in your correspondence of August 25, 2004, the listings for temperature on Crane Creek and Little Weiser River were not included in Table A or the discussion of listed pollutants. It is unclear if you intend to develop a TMDL for temperature in this submittal.</p> <p>Table C. Per the discussion above, the application of intermittent water body standards as a justification for delisting should be reevaluated.</p> <p>Given the lack of temperature data and analysis, temperature should be considered as a data gap and discussed here and elsewhere in the document.</p> <p><b>Chapter 2.0</b></p> <p>As mentioned in your correspondence of August 25, 2004, the listing for temperature on Crane Creek and Little Weiser River were not included in Table 13 or the discussion of listed pollutants.</p> <p>The discussions on listings, uses, standards, and targets are well presented and helpful.</p> <p>Table 14. It should be noted for Cove, North Crane, and South Crane creeks that while no uses have been designated, the presumed use is Cold Water Aquatic Life and Primary Contact Recreation.</p> <p>Page 58 presents the discussion of the application of standards to intermittent waters. The numeric water quality standards do apply to intermittent waters during optimum flow periods sufficient to support their designated uses. At all times, including optimal and sub-optimal flows, the narrative standards, such as for nutrients and sediment, would apply.</p> <p>Page 62. Temperature. This section discusses natural and non-quantifiable background influences on the Weiser as the suspected cause of the increased water temperatures. While this may be the case, additional documentation of modeling is needed to support these claims, as suggested in Concepts and Recommendations for Using the "Natural Conditions" Provisions of the Idaho Water Quality Standards, IDEQ, April 2003. In addition, required elements of a TMDL include an analysis of</p>	<p>A Potential Natural Vegetation TMDL has been developed to address temperature in the Weiser River watershed.</p> <p>DEQ is currently awaiting guidance from the EPA on protocols for monitoring streams that are likely to be dry during base flow periods (July 1 through October 1). If the decision is made to monitor macroinvertebrates, habitat and fish during late winter and early spring runoff periods, then we will pursue monitoring at that time.</p> <p>A Potential Natural Vegetation TMDL has been developed to address temperature in the Weiser River watershed.</p> <p>A Potential Natural Vegetation TMDL has been developed to address temperature in the Weiser River watershed.</p> <p>Thank you.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>A Potential Natural Vegetation TMDL has been developed to address temperature in the Weiser River watershed.</p>
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<p>loading and quantification or modeling of temperature loadings in the listed waterbody. Based on this quantification and/or modeling, and a source analysis concluding that temperature criteria are exceeded, system potential conditions could be established. Heat load reductions are then applied to segments of the waterbody through surrogate (such as shade increases) or other appropriate means. No such analyses have been presented in the document. Therefore the statement is unsubstantiated.</p> <p>Page 63, first paragraph. The document discusses the gross nonpoint source temperature load allocation as being established at no greater than a 0.14°C increase for nonpoint sources in the basin. It is unclear as to how this target/allocation was derived, since we can find no basis in the Idaho water quality standards for such an allocation for nonpoint sources. Perhaps there is some confusion with the provision allowing <u>point sources</u> to increase stream temperatures 0.3°C above natural temperatures.</p> <p>Page 63, second paragraph. The mainstem TMDL should identify now what allocations are needed at the mouth of each tributary to meet the water quality criteria. If an analysis indicates that tributary temperature reductions are required, load reductions should be assigned at the mouth of the tributaries or a TMDL should be performed on the entire watershed including the tributaries.</p> <p>The examples of how nutrient criteria were applied to create a linkage to nutrient levels and beneficial use support on page 65 and 66 are very well presented and very helpful.</p> <p>Page 66. The document references the 1986 EPA Gold Book several times, including in Table 16. This reference has been replaced by the Ecoregion analysis (EPA, 2000). It is suggested that more recent ecoregional values be cited rather than the Gold Book, since they represent EPA's most current thinking regarding nutrient levels.</p> <p>Page 88. Lower Weiser, Temperature. This section does not present any summary or analysis of the data. Available data should be utilized to develop the temperature TMDL, or the appropriate thermal load and shade could be modeled and presented in this discussion. If insufficient data are available, additional data should be collected and the state should consider delaying the submittal of the temperature TMDL until such data and analysis are available.</p>	<p>A Potential Natural Vegetation TMDL has been developed to address temperature in the Weiser River watershed.</p> <p>A Potential Natural Vegetation TMDL has been developed to address temperature in the Weiser River watershed.</p> <p>Thank you.</p> <p>The Ecoregion Analysis is also mentioned on page 66.</p> <p>A Potential Natural Vegetation TMDL has been developed to address temperature in the Weiser River watershed.</p>
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<p>Page 93. Lower Weiser, Nutrients. The use of Dissolved Oxygen as an indicator of nutrient loading can be used as one line of evidence of nutrient impacts on a waterbody. Investigations and surveys documenting the lack of nuisance growth should also be performed to support this analysis in order to address the narrative portions of Idaho water quality standards that relate to nutrients (IDAPA 58.01.02.200.05 and .06).</p>	<p>This contradicts the previous comment about how well the nutrient linkage was made.</p>
<p>Page 109-111. Mid-Weiser. Page 109 mentions that temperature data were collected for this segment of the river. However, none of the data or discussion of the analyses is presented. Figure 40 shows significant temperature excursions above the criteria. Table 40 should also be revised to indicate that temperature is being added as a pollutant of concern.</p>	<p>A Potential Natural Vegetation TMDL has been developed to address temperature in the Weiser River watershed.</p>
<p>Page 126. Status of Beneficial Uses. Second-to-last sentence should read: ‘E. coli bacteria are <u>not</u> impairing...’</p>	<p>The document will be changed accordingly.</p>
<p>Page 135. Cove Creek. The second paragraph discusses the hydrologic conditions leading to the conclusion that the stream does not support cold water aquatic life. However, more detail should be considered with respect to streambed conditions, aquatic life that is present during flow periods, and whether water quality during periods of flow is adequate to meet water quality standards and support designated and existing beneficial uses.</p>	<p>DEQ is currently awaiting guidance from the EPA on protocols for monitoring streams that are likely to be dry during base flow periods (July 1 through October 1). If the decision is made to monitor macroinvertebrates, habitat and fish during late winter and early spring runoff periods, then we will pursue monitoring at that time.</p>
<p>Page 138. Crane Creek. Per your August 25 memo, a discussion of temperature as a listed pollutant should be included in this section.</p>	<p>A Potential Natural Vegetation TMDL has been developed to address temperature in the Weiser River watershed.</p>
<p>Page 144. Crane Creek. The first paragraph states that it is unclear from the data whether or not nutrients are impairing the water quality of Crane Creek. Based on this data, delisting the water for nutrients (Table B) may not be supported. In the absence of adequate data it may be preferable to postpone the nutrient TMDL until implementation of the Weiser River-SR/HC reductions. Once water quality improvements are realized, delisting could then be considered.</p>	<p>Due to the colloidal nature of the particle size in Crane Creek Reservoir, the water in Crane Creek usually has turbidity concentrations that preclude the development of excessive algae.</p>
<p>Page 149. Little Weiser River. Temperature should be added as a listed pollutant and discussed here.</p>	<p>A Potential Natural Vegetation TMDL has been developed to address temperature in the Weiser River watershed.</p>
<p>Page 152. Little Weiser River. It is stated that a determination regarding sediment and nutrient impairment will be made when macroinvertebrate</p>	<p>Assessment of the referenced data is now included in the document.</p>

<p>data collected in 2002 become available. It is unclear as to why data collected two years ago is still not available. Why is the data not available and will it become available? If the data may not become available, then perhaps sediment and nutrient TMDLs should be developed at this time based on existing index scores, which indicate impairment. Until the data confirm no impairment from nutrients, delisting the waterbody for nutrients (Table B) may not be supported. (See Crane Creek comment above) Further, the sentence in the paragraph on page 157 states that '...nutrients are thought to be at levels that (are) impairing designated uses.'</p> <p>Page 156 - 164. Johnson Creek and West Fork Weiser River. These sections provide limited data and analysis. No flow data nor water column data are presented. If additional information is available, better descriptions of the waterbodies and their condition should be provided.</p> <p>Page 165 – 174. North Crane Creek and South Crane Creek. The application of the intermittent water quality criteria should be evaluated. The water quality criteria still apply during times that water is present in the stream.</p> <p>Page 181. Data Gaps. Temperature data has not been presented. It should be either presented or identified as a data gap.</p> <p><b>Chapter 3.0</b></p> <p>Page 185. Sources of Pollutants of Concern. Any CAFOs that may be present in the watershed should be identified as possible sources. Although they are prohibited from discharging, identifying them will assure they receive a waste load allocation of zero.</p> <p>Page 186. Temperature. The document mentions that the SSTEMP analytical model was run on data from the Weiser River. The elements of this modeling should be presented in the document and results summarized in a manner that allows a critical review. The temperature loading calculations and modeling results should support the general discussion of the conditions in the watershed. The analysis should be presented on a section-by-section basis. The document should also present a comprehensive source analysis.</p> <p>Page 191. Total Phosphorous Allocations. It should be explained why a phosphorous analysis is presented in this chapter and not an analysis of the other pollutants. Is it to present the load allocations</p>	<p>Additional reconnaissance level information has been added to the document.</p> <p>The data presented indicates both streams are dry from June through December in 2001 and 2002. Further discussion and guidance from the EPA on what biological communities are expected during winter and spring is needed.</p> <p>A Potential Natural Vegetation TMDL has been developed to address temperature in the Weiser River watershed.</p> <p>An inventory of CAFOs in the watershed will be made during implementation planning. This approach was used for the Weiser Flat TMDL and approved by the EPA.</p> <p>A Potential Natural Vegetation TMDL has been developed to address temperature in the Weiser River watershed.</p> <p>Allocations for other pollutants are included in Section 5.4 of the document.</p>
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<p>for all of the unlisted tributaries for the downstream Snake River TMDL?</p> <p>Section 3.2. This section presents a subheading for Point Sources, but not for Nonpoint Sources.</p> <p>Section 3.2. The second sentence states that neither WWTP facility requires a waste load allocation at this time. This is technically incorrect. They may not need any reductions in their discharges, but a specific waste load allocation is needed because they are a source of pollutant loading. If no WLA is assigned, it will be assumed to be zero, and zero limits will be carried into the NPDES permit.</p> <p>Section 3.2. The Point Source discussion should include industrial and municipal storm water discharges. Although point sources, they receive a load allocation, not a waste load allocation. CAFOs should also be identified.</p> <p>Page 206. Total Phosphorous Point Sources. This section presents data for the city of Cambridge WWTP, but no data is presented on the city of Council's WWTP. In order to determine an accurate current loading and distribute the loading capacity, relevant data should be presented.</p> <p><b>Chapter 5.0</b></p> <p>Page 219. The fourth paragraph discusses the need to base the load capacity on critical conditions. The document should present a discussion of how critical conditions were addressed for each pollutant in each waterbody.</p>	<p>This was an oversight and will be corrected.</p> <p>The following is an excerpt from an email from Mark Phillipini to Mike Ingham on February 23, 2004: <i>We gave Mike some misdirected advice on the last go-round. We had him include specific discussions of the POTW WLA's. But in reviewing the document, if the Upper Weiser supports delisting for nutrient and sediment, then no WLAs for the POTWs would be necessary. The POTWs would not be discharging to a 303(d) listed stream. So there are numerous places in the document where the discharges are discussed in terms of WLAs and the wording should be changed to correct this.</i></p> <p>See page 226 of the document. The wastewater treatment plants in the cities of Cambridge and Council are having negligible influence on water quality. The data indicated that discharges to the river had little to no affect of total phosphorus loads. These facility's waste load allocations should be established at the current NPDES permitted levels.</p> <p>We will add appropriate data for the City of Council.</p> <p>See Seasonal Variation on page 228. Bacteria loads are based on the critical period when a high probability exists for primary contact recreational use, such as swimming. However, load reductions should be based on reducing bacteria levels throughout the year and should also provide for full support of secondary contact recreation, which includes activities such as fishing where the possibility of ingesting river water is still a concern.</p> <p>Targets selected for sediments are based on the use of biological indicator species. Water column targets for TSS are designed to reduce the slugs of sediment associated with high discharge periods. However, all sediment sources must be addressed to meet the substrate targets.</p> <p>See the Addendum to the Weiser River Subbasin Assessment and TMDL for information about the Potential Natural Vegetation (PNV) temperature TMDL.</p>
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<p>Table 103. The temperature target for the Lower Weiser is expressed as 22°C, and when above 22°C, no more than 0.14°C increase from anthropogenic sources. It is unclear how this target was derived from the water quality criteria and how it was determined to be appropriate for this segment. Also, the temperature target should include the 19°C daily average criteria as well as the 22°C instantaneous criteria. There is no analysis that demonstrates that the temperature exceeds criteria naturally. Surrogate targets such as shade, which provide a linkage to implementation, are also missing.</p>	<p>A Potential Natural Vegetation TMDL has been developed to address temperature in the Weiser River watershed.</p>
<p>Table 103. Temperature targets should be calculated and stated for both the Little Weiser River and Crane Creek.</p>	<p>A Potential Natural Vegetation TMDL has been developed to address temperature in the Weiser River watershed.</p>
<p>Table 105. The Load Capacity for the Lower Weiser is expressed as the temperature criteria target. This is not an appropriate expression of the Load Capacity. A relevant surrogate or capacity in terms of heat units (e.g. Joules per square meter per second) is needed.</p>	<p>A Potential Natural Vegetation TMDL has been developed to address temperature in the Weiser River watershed.</p>
<p>Table 109. Existing Loads. It is unclear where the 69.1 j/m<sup>2</sup>/sec load was derived. Please provide an appropriate analysis.</p>	<p>A Potential Natural Vegetation TMDL has been developed to address temperature in the Weiser River watershed.</p>
<p>Table 113. It is unclear how the margin of safety of 10% sampling error plus 4% analytical error were derived for sediment and bacteria. How was this determined to be an appropriate margin of safety?</p>	<p>The margin of safety varies by pollutant. In these cases, the margin of safety for sediment and bacteria is based on the statistical analysis of existing data and is compared to water quality modeling results.</p>
<p>Page 228. Waste Load Allocations. The last sentence of the first paragraph in this section states that the WLAs for the WWTPs ‘should’ be established at the current NPDES permitted levels. If this is DEQ’s intent, specific WLAs for these facilities must be included in the TMDL. A term such as ‘have been’ would be more appropriate. Also, the temperature loads for these two point sources must be identified in order to establish an appropriate WLA. Otherwise, it will be assumed that these point sources have a zero WLA. Again, analyses of the capacities or loading for temperature are missing.</p>	<p>We will change the language from “should be” to “have been”.</p>
<p>Table 114. Background Allocations. It is unclear how the background levels were established for each of the pollutants in each of the waterbodies.</p>	<p>Further refinement of natural and background sources will be ongoing as more data is collected. Since TMDLs are a dynamic process, the document will be</p>

<p>Background levels must be based on some level of data or reference condition. These values appear arbitrary.</p> <p>Page 231. Construction Storm Water and Allocations. This section presents a good analysis of how these elements are addressed in the TMDL. However, discussions of industrial discharges and municipal discharges should also be presented. Industrial operations should be covered under a general permit for discharge of stormwater. The two municipalities likely also have stormwater discharges which, while considered a point source, do not require a permit. These sources should be addressed and accounted for in the load capacity and non-point source allocations.</p> <p>Page 233. Table 115. The Load Allocation presented in this table for thermal is not considered a valid means of expressing an allocation for heat. A more complete analysis and allocation scheme needs to be presented.</p> <p>Page 244. Table 120. The TMDL, which is presented for thermal loads to the Lower Weiser River, is not considered a valid expression of a TMDL. A valid analysis and presentation of the temperature TMDL will be required.</p>	<p>updated as appropriate.</p> <p>Neither Cambridge (pop. 355) nor Council (pop. 765) is currently designated as a regulated small MS4 that requires an NPDES permit. They also (to DEQ's knowledge) do not have any industries that would require a <i>Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activities (MSGP)</i>.</p> <p>A Potential Natural Vegetation TMDL has been developed to address temperature in the Weiser River watershed.</p> <p>A Potential Natural Vegetation TMDL has been developed to address temperature in the Weiser River watershed.</p>
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## **Appendix G. §303 (d) List Crosswalk**

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HUC 17050124 2002 §303 (d) list																									
Basin	Segment Name	Bac	Cd	Ukn	Pb	Hg	Met	Nut	O/G	Org	DO	IOrg	Path	Pest	pH	P	Sa	Se	Sed	TSS	Tem	TDG	Tox	NH3	
ID17050124SW002_02	Cove Creek - 1st and 2nd order							1											1						
No change from 1998 §303 (d) list																									
ID17050124SW003_05	Crane Creek - Crane Creek Reservoir Dam to mouth	1						1											1		1				
1998 §303 (d) list did not include temperature																									
ID17050124SW022_02	Johnson Creek - source to mouth			1																					
No change from 1998 §303 (d) list																									
ID17050124SW022_03	Johnson Creek - source to mouth			1																					
No change from 1998 §303 (d) list																									
ID17050124SW008_02	Little Weiser River - source to mouth																				1				
1998 §303 (d) list did not include temperature																									
ID17050124SW008_04	Little Weiser River - source to mouth							1											1						
No change from 1998 §303 (d) list																									
ID17050124SW008_03	Little Weiser River - source to mouth							1											1						
No change from 1998 §303 (d) list																									
ID17050124SW006_04	North Crane Creek - 4th order			1																					
1998 §303 (d) list included bacteria, nutrients, sediment and temperature																									
ID17050124SW006_02	North Crane Creek - 1st and 2nd order			1																					
1998 §303 (d) list included bacteria, nutrients, sediment and temperature																									
ID17050124SW006_03	North Crane Creek - 3rd order			1																					
1998 §303 (d) list included bacteria, nutrients, sediment and temperature																									

Basin	Segment Name	Bac	Cd	Ukn	Pb	Hg	Met	Nut	O/G	Org	DO	IOrg	Path	Pest	pH	P	Sa	Se	Sed	TSS	Tem	TDG	Tox	NH3
<b>ID17050124SW005_02</b>	<b>South Crane Creek - 1st and 2nd order</b>			1																				
<i>No change from 1998 §303 (d) list</i>																								
<b>ID17050124SW005_03</b>	<b>South Crane Creek - 3rd order</b>			1																				
<i>No change from 1998 §303 (d) list</i>																								
<b>ID17050124SW005_04</b>	<b>South Crane Creek - 4th order</b>			1																				
<i>No change from 1998 §303 (d) list</i>																								
<b>ID17050124SW001_06</b>	<b>Weiser River - Keithly Creek to mouth</b>	1						1											1		1			
<i>This assessment unit includes 2 segments from the 1998 §303 (d) list.</i>																								
<i>Galloway Dam to Snake River - bacteria, DO, nutrients, sediment and temperature</i>																								
<i>Little Weiser River to Galloway Dam - bacteria nutrients and sediment</i>																								
<b>ID17050124SW001_05</b>	<b>Weiser River - Keithly Creek to mouth</b>	1						1											1		1			
<i>This assessment unit includes 2 segments from the 1998 §303 (d) list.</i>																								
<i>Galloway Dam to Snake River - bacteria, DO, nutrients, sediment and temperature</i>																								
<i>Little Weiser River to Galloway Dam - bacteria nutrients and sediment</i>																								
<b>ID17050124SW007_05</b>	<b>Weiser River - source to Keithly Creek</b>							1											1					
<i>No change from 1998 §303 (d) list</i>																								
<b>ID17050124SW017_03</b>	<b>West Fork Weiser River - source to mouth</b>			1																				
<i>No change from 1998 §303 (d) list</i>																								
<b>ID17050124SW017_02</b>	<b>West Fork Weiser River - source to mouth</b>			1																				
<i>No change from 1998 §303 (d) list</i>																								